

EXHIBIT

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AFFIDAVIT of ANDREW HEBERT

On November 23, 2004 I was in the Gymnasium at the Massachusetts Treatment Center.


At approximately 1:30 p.m. Staff Program Director, Mr. Robertt Howland approached me and stated, "You have a problem with the Wiccans using the cushions". I told him that I did not have a problem with the Wiccan group using the Zafus (Buddhist meditation cushions) as long as they took care of them. Mr. Howland's response was "No, you don't understand, you DO have a problem with the Wiccans using the cushions. I nodded my head because I understood that was what Staff Program Director Howland expected of me. Mr. Howland then informed me that the Wiccans would never be using the cushions again.

I do not now, nor have I ever had a problem with the Wiccan group using the Zafus for their meditation as long as they are taken care of.

I declare under the pains and penalty of perjury that the foregoing is true and correct.

Date 11/23/04

  
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Andrew Hebert

  
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Joseph E. Blake

Witness